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Attorneys for Plaintiffs and Putative Class

[ADDITIONAL COUNSEL LISTED ON  
SIGNATURE PAGE]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

LD, DB, BW, RH, and CJ on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

UNITED BEHAVIORAL HEALTH, a  
California Corporation, and  
MULTIPLAN, INC., a New York  
Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

~~PROPOSED~~ **ORDER AND  
STIPULATION REGARDING BRIEFING  
SCHEDULE AND PLAINTIFFS' THIRD  
AMENDED COMPLAINT**

**STIPULATION**

The parties in the above-referenced case, by and through their counsel of record, hereby stipulate as follows:

1. WHEREAS Plaintiffs' deadline to file a standard of review motion is currently September 1, 2021; and

2. WHEREAS, to accommodate an exchange of documents and information potentially relevant to the standard of review, which the Parties have begun but not yet completed, and to facilitate efficient briefing of the standard-of-review issue to the Court, the parties have met and conferred and have agreed and stipulate to a revised briefing schedule regarding the standard of review, as set forth below; and

3. WHEREAS, in connection with the standard of review briefing and the production of documents, the parties have further met and conferred regarding amending the operative complaint and Defendant United Behavioral Health does not object, as a procedural matter (but reserves all defenses and other objections), to Plaintiff's proposal to amend the current complaint to add United Healthcare Insurance Company (UHC), a corporate affiliate of Defendant United Behavioral Health, as a defendant by September 8, 2021; and

4. WHEREAS, for purposes of efficiency, the parties agree and stipulate that Defendants shall not need to file new answers or defenses to the proposed Third Amended Complaint;

NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through their respective counsel and subject to the Court's approval that:

1. Plaintiff may file a proposed Third Amended Complaint adding United Healthcare Insurance Company as a defendant on or before September 10, 2021, and Defendants' previously-filed answers shall be deemed effective in response to the Third Amended Complaint;

2. Plaintiffs' motion regarding the applicable standard of review shall be filed on or before September 22, 2021;

3. Defendants' opposition shall be filed on or before October 13, 2021;

4. Plaintiffs' reply brief shall be filed on or before October 20, 2021;

5. Motion hearing dates are to be decided by the Court based on the Court's schedule

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: September 1, 2021

**DL LAW GROUP**

By: /s/ David M. Lilienstein

Katie Joy Spielman

David M. Lilienstein

**NAPOLI SHKOLNIK, PLLC**

Matthew M. Lavin

Wendy A. Mitchell

Attorneys for Plaintiffs

LD, DB, BW, RH, and CJ on behalf of themselves  
and all others similarly situated

Dated: September 1, 2021

**GIBSON, DUNN & CRUTCHER, LLP**

By: /s/ Lauren M. Blas

Lauren M. Blas

Geoffrey Sigler

Attorneys for Defendant

UNITED BEHAVIORAL HEALTH

Dated: September 1, 2021

**PHELPS DUNBAR LLP**

By: /s/ Errol King

Carys A. Arvidson

Errol King

Attorneys for Defendant

MULTIPLAN, INC.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4 DATED: September 9, 2021

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28 Hon. Yvonne Gonzalez Rogers